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Attorneys for Calista Enterprises Ltd. and Alexander Zhukov

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON – PORTLAND DIVISION

CALISTA ENTERPRISES LTD.,
a Republic of Seychelles company,

Plaintiff,

- v. -

TENZA TRADING LTD.,
a Cyprus company,

Defendant.

Case No. 3:13-cv-01045-SI

**JOINT STIPULATED MOTION TO
EXTEND TIME FOR COUNTER-
DEFENDANT ALEXANDER ZHUKOV
TO RESPOND TO THE FIRST
AMENDED COUNTERCLAIM OF
COUNTERCLAIMANT TENZA
TRADING LTD.**

Pursuant to Local Rule 16-3

TENZA TRADING LTD.,
a Cyprus company,

Counterclaim Plaintiff,

- v. -

CALISTA ENTERPRISES LTD.,
a Republic of Seychelles company, and

ALEXANDER ZHUKOV,
a Citizen of the Czech Republic,

Counterclaim Defendants.

Local Rule 7.1 Certification

The undersigned counsel certify that the motion at issue is stipulated by counsel.

Motion

Tenza Trading Ltd. (“Tenza”), Calista Enterprises Ltd. (“Calista”) and Alexander Zhukov (“Mr. Zhukov”) submit the following stipulated motion for this Court’s consideration.

The Parties request an additional brief extension of thirty-three days for Mr. Zhukov to file and serve a pleading in response to the First Amended Counterclaim of Tenza. Mr. Zhukov’s response, as set by a previous order of this Court, Docket No. 163, is currently due by October 22, 2014. Mr. Zhukov’s response would, therefore, be due on Monday, November 24, 2014.

As grounds for this motion, the Parties state that they have made substantive progress towards settlement over the past 30 days that this Court previously granted an extension and that a stipulated resolution of this litigation is imminent and likely to be completed within the next

approximate month. In light of the likelihood of settlement, none of the parties wish to incur the costs associated with a response to the First Amended Counterclaim by Mr. Zhukov.

This motion is made in good faith and not for purposes of delay. The requested extension will not require any modification to any other case management dates set by this Court.

Dated this 22nd day of October, 2014.

Respectfully submitted,

/s/ Matthew Shayefar
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